#### UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

IN RE:	) In Proceedings Under Chapter 11
DOUBLE HELIX CORPORATION, d/b/a KDHX COMMUNITY MEDIA,	) Case No. 25-40745
Debtor.	) )

# APPLICATION TO EMPLOY BRAD DEUTSCH AND THE LAW FIRM OF FOSTER GARVEY PC AS SPECIAL FCC COUNSEL

COMES NOW Double Helix Corporation, d/b/a KDHX Community Media ("Debtor"), by and through their undersigned counsel, and for their *Application to Employ Brad Deutsch and the law firm of Foster Garvey PC as Special FCC Counsel* (the "Application"), respectfully states as follows:

- 1. On March 10, 2025 (the "Petition Date"), Debtors filed their voluntary petition for relief under Chapter 11, Title 11 of the United States Code (the "Bankruptcy Code").
- 2. Debtor seeks an order pursuant to 11 U.S.C. § 327(e) and Rule 2014(a) of the Federal Rules of Bankruptcy Procedure authorizing Debtors to employ Brad Deutsch and the law firm of Foster Garvey PC as special FCC counsel.
- 3. Debtor seeks to retain the Firm to provide assistance with FCC Regulatory issues surrounding the transfer of Debtor's license pursuant to a potential sale agreement.
- 4. Debtors believe that Brad Deutsch and the law firm of Foster Garvey PC is competent and skilled in connection with the matters for which this Application is submitted.
- 5. Foster Garvey PC is owed approximately \$18,961.00 from prepetition work performed related to the potential transfer of Debtor's FCC license.

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6. Brad Deutsch and the law firm of Foster Garvey PC do not represent or hold any

interest adverse to the Debtor or the estate.

7. Debtors have been informed by Brad Deutsch that the rate charged will range from

to \$325 for paralegals, \$375 for associates and \$761 for the services of Mr. Deutsch. Debtors

believe that the charges are reasonable and necessary for services of the nature intended to be

performed by Brad Deutsch.

8. The Declaration of Brad Deutsch is attached hereto as part of this Application and

incorporated herein as if more fully set forth.

WHEREFORE, Debtors pray this Court approves the employment of Brad Deutsch for the

purpose of rendering special counsel services to the estate as set forth herein, that the compensation

of Brad Deutsch is subject to approval by the Court in accordance with 11 U.S.C. § 328, and for

such other further Orders this Court deems just and proper.

Respectfully submitted,

CARMODY MACDONALD P.C.

By: /s/ Robert E. Eggmann

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PROPOSED ATTORNEYS FOR DEBTORS

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of this document was filed electronically with the United States Bankruptcy Court and has been served on the parties in interest via email by the Court's CM/ECF system as listed on the Court's Electronic Mail Notice List on this  $2^{nd}$  day of April, 2025.

/s/ Robert E. Eggmann

### UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

IN RE:	) In Proceedin	ngs Under Chapter 11
DOUBLE HELIX CORPORATION, d/b/a KDHX COMMUNITY MEDIA,	Case No. 25	-40745
Debtor.	)	

# DECLARATION OF BRAD DEUTSCH IN SUPPORT OF DEBTORS' APPLICATION TO EMPLOY FOSTER GARVEY PC AS SPECIAL FCC COUNSEL FOR DEBTOR

COMES NOW Brad Deutsch, states and declares as follows:

- 1. I am over the age of 18 and am in all ways competent to make this Declaration.
- 2. I am an attorney at law duly admitted to practice federal law and I am a Shareholder in the law firm of Foster Garvey PC (the "**Firm**").
- 3. Debtors seek to employ the Firm to provide assistance with FCC Regulatory issues surrounding the transfer of Debtor's license pursuant to a potential sale agreement.
- 4. Neither the Firm nor I have represented any creditors of Debtor, any other party-in-interest, their respective attorneys and accountants, the United States Trustee, or any person employed by the office of the United States Trustee in connection with any matters adverse to Debtor, or in any capacity in which confidential knowledge of a creditor has been acquired that would bear on the proposed retention by Debtor.
- 5. The Firm's hourly rates will range up to \$325 for paralegals, \$375 for associates and \$761 for me. The Firm is currently holding the sum of \$0.00 as a retainer.
- 6. The Firm is owed approximately \$18,961.00 from prepetition work performed related to the potential transfer of Debtor's FCC license.

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7. To my knowledge, I do not represent or hold any interest adverse to the Debtor or the estate.

8. To the best of my knowledge, I know of no reason why either I or the Firm should not act as special counsel for Debtors in this proceeding.

By: /s/ Brad Deutsch
Brad Deutsch